



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

EC-2
970366

October 24, 1997

Reply To
Attn Of: ECO-088

Ref: 96-015-AFS

Bill Angelus
EIS Coordinator
Ketchikan Ranger District
Tongass National Forest
3031 Tongass Avenue
Ketchikan, Alaska 99901

Dear Mr. Angelus:

We have reviewed the final Environmental Impact Statement (final EIS) and Record of Decision (ROD) for the proposed **Swan Lake-Lake Tyee Intertie** project in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and §309 of the Clean Air Act. The proposed project is to construct and operate a 57 mile long 137-kV transmission line through Tongass National Forest lands on Revillagigedo Island and the Cleveland Peninsula.

We are concerned with the methodologies used and conclusions drawn in the EIS with respect to cumulative watershed effects (CWE) within the project corridor; they do not appear to be consistent with the 1997 revision to the Tongass Land Management Plan (TLMP, or Plan) or other Forest Service direction. It is our understanding that the "35 percent disturbance in a 15-year period" criteria being used as an indicator of significant CWE in this EIS was abandoned during the recent TLMP revision because it was not believed to be a meaningful measure of significant overall effects within a specific watershed. Similarly, we are not aware of information that indicates that 25 percent of Riparian Management Areas harvested over a 20-year period (another measure of CWE used in the EIS) is a meaningful measure of significant CWE. Consequently, we find it difficult to determine the significance of cumulative watershed effects associated with the proposed project, when considered collectively with past and reasonably foreseeable future activities.

TLMP Standard and Guideline S&W112(II) provides direction for conducting watershed analysis and evaluating cumulative watershed effects, and directs the user to Appendix J of the Plan for further information on watershed analysis and also refers the user to BMP 12.1 of the Soil and Conservation Handbook (FSH 2509.22) for CWE guidance. BMP 12.1 provides only general guidance and does not indicate how a CWE analysis should be conducted. Appendix J indicates that intensive watershed analysis is warranted in watersheds with "more than 20% of the watershed acres with trees in second growth younger than 30 years," yet this criteria/approach has not been used in the evaluation of cumulative watershed impacts in this EIS. From our

perspective, we believe that the development of a watershed analysis is the only manner of assessing CWE in a truly meaningful way. We recommend that the Forest Service integrate watershed analysis into future project planning activities to effectively evaluate and disclose cumulative watershed effects pursuant to the implementing regulations for NEPA (see 40 CFR 1500-1508).

Should you have any questions, please contact Bill Ryan of my staff at (206) 553-8561.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard B. Parkin". The signature is fluid and cursive, with the first name "Richard" being more prominent.

Richard B. Parkin, Chief
Geographic Implementation Unit

cc: Jim Ferguson, ADEC
Max Copenhagen, USFS-Alaska Region

Summary Paragraph Form

ERP Number F-AFS-L60103-AK

RATING EC

COMMENTLTR

10/24/97

Name of EPA Official Responsible For Review Of Project (Principal Reviewer)

Bill Ryan

Summary

expressed environmental concerns
~~EPA is concerned with the methodologies used and conclusions drawn in~~ *about*
~~the EIS with respect to cumulative effects within the project corridor.~~

Approved For Publication

(Initials of OFA
Approving Official)

Note: Transmit 2 copies to MIU